

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Washington, D.C.**

BID PROTEST

SNAP INC.

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

CFC No. 20-1318 C

Judge _____

MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff SNAP Inc. (“SNAP”), through undersigned counsel, respectfully requests that the Court file the SNAP Complaint under seal. SNAP’s Complaint contains SNAP confidential and proprietary information, the release of which would cause substantial and irreparable harm to SNAP.

Pursuant to the Court’s rules, SNAP is simultaneously filing a redacted copy of the Complaint that is suitable for public release. We respectfully request that the redacted version of the Complaint not be released outside the Court or the government until approved for public release by counsel for the U.S. Department of Justice.

Filing under seal is necessary to ensure continued protection of sensitive data protected by the Federal Acquisition Regulation and as permitted by this Court’s rules.

Respectfully submitted,

Date: October 5, 2020

By: /s/ Alexander J. Brittin
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Of Counsel

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CERTIFICATE OF SERVICE

I certify that I have caused a true and accurate copy of SNAP Inc.'s Motion for Leave to File Under Seal to be delivered by the delivery method indicated below on the 5th day of October 2020 to the following:

United States Department of Justice (*via electronic mail*)
Commercial Litigation Branch
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/s/ Alexander J. Brittin
Alexander J. Brittin